



September 20, 2005

Mr. John F. Carter
Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 95105

2005 SEP 28 AM 9 39

**Re: Comments Regarding FDIC Application #20051977; Wal-Mart
Application for Insurance and Industrial Bank Charter**

Dear Mr. Carter:

D.L. Evans Bank is writing to oppose the application of Wal-Mart Stores, Inc., for Federal Deposit Insurance coverage for an ILC charter in Utah. D.L. Evans Bank is a community bank and we are convinced that allowing Wal-Mart to own a bank charter and possibly open branches in its nation wide network of stores would do severe damage to our community financial institution.

It appears that Wal-Mart has stated their intentions to operate a limited ILC charter in Utah. We are very skeptical of these stated intentions. Their statements that the operation will remain narrow in scope seem to contradict the company's history and corporate philosophy. The Wal-Mart organization has made other attempts to get into the banking business. Our small community has seen Wal-Mart open their large chain stores throughout Idaho and in many instances they have done significant damage to small locally owned and community operated businesses. We are certain that Wal-Mart's entrance into the banking business would cause great harm to our institution and the entire banking industry. Wal-Mart is already considered a monopoly in many respects and they need to be held where they are, rather than allowed to continue their growth and dominance into other industries.

Even Congress has reaffirmed our nation's policy against the mixing of banking and commerce. Mixing banking and commerce could create serious conflicts of interest and distort credit policies and decisions. The impartial allocation of credit is the heart of our financial system and needs to be preserved. We do not believe a Wal-Mart Bank would offer credit at reasonable terms to its competitors; Wal-Mart has rarely given their competitors a reasonable chance to survive. The giant organization, Wal-Mart, could possibly even require suppliers to Bank at their organization. Where will the growth and dominance of Wal-Mart stop if it does not stop with being denied access into the banking industry?

Community Banks throughout our nation are speaking out about Wal-Mart's intention to crash into the banking business. We believe the decision will impact the entire nation. Wal-Mart could succeed in the banking industry due to their numerous locations and the large amounts of capital they could dump into their banking activities. Clearly, it would

be Wal-Mart and their shareholders that would benefit. What about the remainder of the country? The entire nation, including small communities and their banks, benefits from fair competition and consumer choice. Wal-Mart has never been bashful about undercutting prices of local businesses and driving them out of business. What would stop Wal-Mart from destabilizing many small financial institutions?

Our small community bank has operated in Idaho for over 100 years. Our bank has served the Idaho community for many years and we are committed to continuing our great service. There are many Wal-Mart stores in Idaho and many of their stores are located near our branches. Wal-Mart is a giant compared to our small institution, and many other institutions like ours. If the giant retailer is allowed to perform banking activities right near our branches the competition would be unfair and Wal-Mart would do significant damage to our small bank.

For the benefit and welfare of the majority in our nation, including small community banks and the countless communities we serve, please do not allow Wal-Mart to crash into the banking business. It is a great opportunity to make a decision that will benefit the majority by assertively denying Wal-Mart's request for deposit insurance.

Sincerely,

Katherine E. Adams
Albion, Idaho



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Pauline Adams



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Sincerely,

Linda Hatchison
Albion, Idaho



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Carol Nye
Albion, Id